

# HPNS RADIOLOGICAL BUILDING REMEDIATION GOAL EVALUATION

## Update, August 10, 2021

### Recent history

- August 20, 2020: EPA letter stating EPA's inability to support Navy's RESRAD BUILD risk estimates and concur with the Navy's protectiveness determination
- Late 2020/early 2021: Navy email and letters criticizing BPRG calculator
- March 29, 2021: first DRC-level meeting
- April 22, 2021: Navy submittal of new RESRAD BUILD (RRB) simulations responding to concerns identified in EPA's August 2020 letter
- July 8, 2021: second DRC-level meeting
- July 15, 2021 and July 20, 2021: EPA risk calculations to Navy and Navy comments
- July 23, 2021: Navy sent "pre-draft final evaluation" of building RGs based on RESRAD BUILD calculations
- **August 4, 2021: EPA response to Navy comments, and summary of our outstanding concerns with the Navy's RESRAD BUILD simulations.**

### EPA evaluation

- EPA risk calculations show risks from most radionuclides of concern in the risk range ( $< 1 \times 10^{-4}$ ) if key assumptions during retesting. Exceptions are cobalt-60 ( $2.5 \times 10^{-4}$ ) and cesium-137 ( $2.0 \times 10^{-4}$ ).
- **We expect the Navy to verify two: 1) that the removable fraction is less than 20% of the RGs and 2) the area of contamination is less than a specified amount (tentatively 32 m<sup>2</sup>). HQ staff have raised concerns about how the Navy will verify the area of contamination.**

### Recent and Next Steps

- Last week, we shared our spreadsheets with the Navy. Yesterday, we received initial feedback.
- This Friday, the Navy plans to submit to EPA an updated Five-Year Review addendum on the building radiological remediation goals
- Next week, we will provide the spreadsheets and the conclusions from our evaluation to EPA headquarters.